

# United States District Court

**SOUTHERN** DISTRICT OF **TEXAS**

UNITED STATES OF AMERICA

V.

**Steven Clark**

**CRIMINAL COMPLAINT**

CASE NUMBER: C-11-831m

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 28, 2011 in Bee county, in the SOUTHERN District of TEXAS, defendant(s) did, (Trace Statutory Language of Offense)

**Whoever knowingly and with intent to defraud possesses fifteen or more devices which are counterfeit or unauthorized access devices.**


in violation of Title 18, United States Code, Section(s) 1029 (a)(3).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:  
Official Title

**SEE ATTACHED**

Continued on the attached Sheet and made a part hereof:

☒ Yes ☐ No



**Daniel E. Morales**

Signature of Complainant

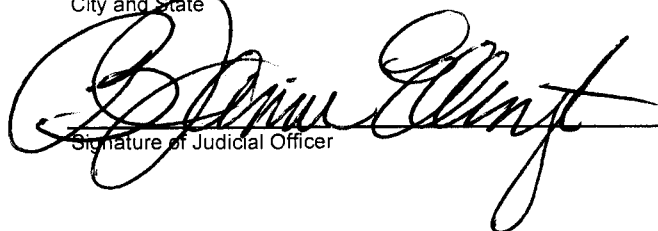
Sworn before me and subscribed in my presence,

July 13, 2011  
Date

at Corpus Christi, Texas  
City and State

**B. Janice Ellington U.S. Magistrate Judge**

Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Daniel Morales, being duly sworn, hereby depose and say

I am a special agent, assigned to the San Antonio Field Office, United States Secret Service, since March 2005 and a special agent of the United States Secret Service since March 1996.

The information contained in this affidavit is based on my training, experience, and participation in counterfeit credit card investigations, my personal knowledge and observations during the course of this investigation, and information provided to me by other sources noted herein.

On or about June 28, 2011, I was telephonically contacted by Sergeant Art Gamez from the Beeville Police Department. Sergeant Gamez advised that STEVEN CLARK had been arrested during a traffic stop for possession of Fraudulent Use or Possession of Identifying Information. STEVEN CLARK had a Green Dot pre-paid Visa Card in his wallet with the following account number taped on the front xxx-xxxx-8371-009.

Continuing on or about June 28, 2011, Sergeant Gamez further advised that two (2) bags containing hundreds of Comfort Inn Suites receipts with credit card imprints were located in plain view inside the green Nissan Pathfinder bearing Texas License Plate PVT-870.

On or about July 1, 2011, Federal Bureau of Investigation, Special Agent Dan Sigmond and this writer met with Beeville Police Department Sergeant Art Gamez at the Beeville Police Department located at 402 North Washington Street, Beeville, Texas. Sergeant Gamez provided this writer with access to Comfort Inn Suites receipts from the Comfort Inn located at 6350 I-35 North, San Antonio, Texas and the other items seized by the Beeville Police Department. A Walmart receipt for a printer was also located inside a black roller bag.

Continuing on or about July 1, 2011, FBI Special Agent Dan Sigmond and this writer interviewed STEVEN CLARK, at the Beeville Police Department located at 402 North Washington Street, Beeville, Texas. Prior to any questioning STEVEN CLARK was advised of his Miranda Rights verbally by this writer which he acknowledged and waived. CLARK advised that he was the owner of the Nissan Pathfinder that he was driving when he was stopped. CLARK further advised that the items in the vehicle belonged to Robert Isbell. CLARK was questioned as to the purchase of the printer and the magnetic ink which was found inside the black rolling bag. CLARK admitted to purchasing the printer at Walmart on South Padre Island Drive in Corpus Christi, Texas (It is noted that the receipt for the printer was located inside the black rolling bag that CLARK denied was his). CLARK continued by advising that he had only been out of prison for a couple of weeks and it was impossible to find a job with his criminal history.

Continuing on or about July 1, 2011, this writer further reviewed the receipts seized by the Beeville Police Department and found the following receipts contained customer

credit cards imprints and addresses: (It is noted that this is only small portion of the total number of receipts found).

1. Customer with the initials D.E. Discover Card Number xxxx-xxxx-xxxx-2646
2. Customer with the initials T.A. Visa Card Number xxxx-xxxx-xxxx-5710
3. Customer with the initials R.R. Visa Card Number xxxx-xxxx-xxxx-7240
4. Customer with the initials C.B. MasterCard Number xxxx-xxxx-xxxx-2471
5. Customer with the initials M.O. MasterCard Number xxxx-xxxx-xxxx-2637
6. Customer with the initials G.R. Visa Card Number xxxx-xxxx-xxxx-4926
7. Customer with the initials M.R. Visa Card Number xxxx-xxxx-xxxx-2999
8. Customer with the initials R.A. Discover Card Number xxxx-xxxx-xxxx-6236
9. Customer with the initials H.B. Visa Card Number xxxx-xxxx-xxxx-0306
10. Customer with the initials L.R. Visa Card Number xxxx-xxxx-xxxx-1475
11. Customer with the initials V.C. Visa Card Number xxxx-xxxx-xxxx-6150
12. Customer with the initials L.R. Visa Card Number xxxx-xxxx-xxxx-4281
13. Customer with the initials V.T. Visa Card Number xxxx-xxxx-xxxx-9614
14. Customer with the initials J.T. American Express Card Number xxxx-xxxxxx-x2007
15. Customer with the initials J.S. MasterCard Number xxxx-xxxx-xxxx-9108
16. Customer with the initials A.L. American Express Card Number xxxx-xxxxxx-x7008
17. Customer with the initials S.B. Discover Card Number xxxx-xxxx-xxxx-1746
18. Customer with the initials S.O. Discover Card Number xxxx-xxxx-xxxx-4365
19. Customer with the initials D.S. Discover Card Number xxxx-xxxx-xxxx-7665
20. Customer with the initials J.S. Discover Card Number xxxx-xxxx-xxxx-2868
21. Customer with the initials P.R. American Express Card Number xxxx-xxxxxx-x1000


On or about July 6, 2011, this writer telephonically contacted Nora Echeveste, American Express Corporate Security at (866) 375-3684 regarding the Green Dot Gold Pre-Paid Visa Card with American Express Credit Card Number xxxx-xxxx-8371-009 taped on the front, found in the wallet of STEVEN CLARK .

On or about July 7, 2011, this writer received a facsimile from Nora Echeveste regarding American Express Credit Card Number xxxx-xxxx-8371-009. Echeveste advised the American Express Credit Card belonged to an individual with the initials C.D. and that \$4494.00 in charges had been attempted/processed at JCPenny's, Best Buy and Valero Stores.

Continuing on or about July 7, 2011, this writer telephonically contacted American Express Credit Card holder C.D. C.D. advised that he did not know STEVEN CLARK and did not authorize him to conduct the transactions on his behalf. C.D. further advised that his American Express Credit Card had been canceled and a replacement card was being sent to him by American Express.

Based on the above information, this affiant believes that STEVEN CLARK, on or about June 28, 2011, did, in the Southern District of Texas, knowingly possess with intent to

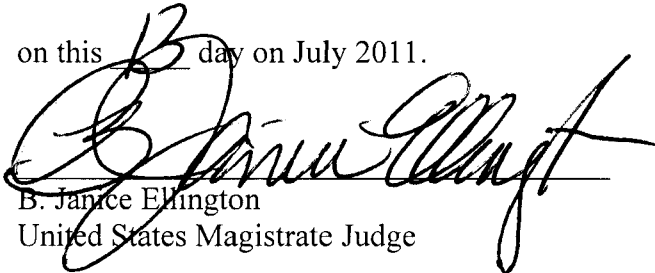
defraud the (21) twenty one access devices in violation of 18 USC 1029(a)(3), Fraud and Related Activity in Connection with Access Devices.



Daniel E. Morales  
U.S. Secret Service

Subscribed to and sworn before me

on this 13 day on July 2011.



B. Janice Ellington  
United States Magistrate Judge